

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

M. M., a minor child, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 08-cv-1080
)	
MCDONALD’S CORPORATION,)	
d/b/a MCDONALD’S, et al.,)	
)	
Defendants.)	

PLAINTIFFS’ NOTICE OF MOTION

COME NOW Plaintiffs M. M. and M. M., minor children, by and through their natural parents and Next Friend, and Beth Miller and Frank Miller, as individuals and the duly appointed and Court ordered Next Friend of their minor children (hereinafter and collectively the “Plaintiffs”), by and through their undersigned counsel, and for their Notice of Motion, state:

1. Plaintiffs present this Notice of Motion for this Court to hear their Motion to Remand filed with this Court April 8, 2008. Plaintiffs also then filed a Memorandum of Law in Support of the Motion to Remand.

2. Plaintiffs’ Motion to Remand is to be heard by the Honorable Elaine Bucklo.

3. Plaintiffs request for their Motion to Remand be heard on Thursday, May 15, 2008, at 9:30 a.m. or as soon thereafter as can be heard.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs’ Notice of Motion to hear Plaintiffs’ Motion to Remand and that the Court grant all such other and further relief as this Court deems just and proper.

Dated: May 6, 2008.

Respectfully submitted,

RECHENBERG LAW, LLC

By: /s/ Paul N. Rechenberg
Paul N. Rechenberg, MO USDC #35039
paul@rechenberglaw.com
Chesterfield Business Parkway
Chesterfield, MO 63005
(636) 728-1900
(636) 530-6805 (facsimile)
Admitted *Pro Hac Vice*

-and-

Brian W. Smith
SMITH & VANTURE, LLP
1615 Forum Place, Suite 4-C
West Palm Beach, Florida 33401
(561) 684-6330
FAX (561) 688-0630
E-mail: bws@smithvantage.com
COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of May, 2008, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Kevin M. Smith
SHOOK, HARDY & BACON L.L.P
2555 Grand Blvd.
Kansas City, Missouri 64108-2613
(816) 474-6550
ATTORNEYS FOR MCDONALD'S CORPORATION

Michael A. Pope
Christopher M. Murphy
McDermott, Will & Emery California, Inc., and King Group,
227 West Monroe St. Inc., Suite 4400
Chicago, IL 60606
E-mail: gvance@mwe.com
cmurphy@mwe.com
mpope@mwe.com

Larry D. Drury Attorney for Debra Moffatt
LARRY D. DRURY, LTD.
205 W. Randolph
Suite 1430
Chicago, Illinois 60606
(312) 346-7950
FAX (312) 346-5777
E-mail: ldrurylaw@aol.com
Co-Lead Counsel

Athan T. Tsimpedes Attorney for Cynthia Tsimpedes, Next Friend of Elene Tsimpedes
LAW OFFICES OF ATHAN T. TSIMPEDES 1420 New York Avenue, NW 7th Floor
Washington, DC 20005
(202) 638-2100
FAX (202) 449-3499
E-mail: atsimpedes@comcast.net
Co-Lead Counsel

Thomas E. Pakenas Attorney for Debra Moffatt
DALE AND PAKENAS
641 W. Lake Street
Suite 400
Chicago, Illinois 60661
(312) 258-1800
E-mail: tpakenas@earthlink.net
Co-Liaison Counsel

Edward H. Zebersky Attorney for David and Cherilyn Levy individually and as parents and legal guardians of their daughter Sydni Levy
ZEBERSKY & PAYNE, LLP
400 Hollywood Blvd.
Suite 400-N
Hollywood, Florida 33021
(954) 989-6333
FAX (954) 989-7781
E-mail: ezebersky@zpklaw.com

Gary M. Farmer Attorney for David and Cherilyn Levy individually and as parents and legal guardians of their daughter Sydni Levy
FREEDLAND, FARMER, RUSSO
& SELLER, PL
2665 Executive Park Dr., Suite 3
Weston, Florida 33331
(954) 467-6400
E-mail: gary@westonlawyers.com
Co-Lead Counsel

Michael S. Shipwash Attorney for Amanda Spaid and Scott Spaid, individually and on behalf of
minor children, Sean, Sarah and Adam Spaid
LAW OFFICE OF MICHAEL S. SHIPWASH
9040 Executive Park
Suite 315
Knoxville, TN 37923
(865) 691-4454
E-mail: mikeshipwash@shipwashlaw.com

Thomas G.A. Herz, Jr. Attorney for Alissa Krinsky, Jenna Friedman, and Dave Burdi
LAW OFFICES OF THOMAS G.A. HERZ, JR.
39 S. LaSalle Street, Suite 720
Chicago, Illinois 60603
(312) 236-4379
FAX (312) 267-6901
E-mail: tgahlaw@yahoo.com

David W.T. Brown Attorneys for Kathryn E. Stepkowski, R.K. and Shiloh Knoll
Paul E. Heidenreich
HUSKINSON & BROWN, LLP
865 Manhattan Beach Blvd.
Suite 200
Manhattan Beach, CA 90255
(310) 545-5459
E-mail: huskinsonbrown@att.net

Robert J. Shelist Attorneys for Alissa Krinsky, Jenna Friedman, and Dave Burdi
Mark A. Schwartz
SHELIST & SCHWARTZ, LLP
1061 W. Monroe Street
Chicago, Illinois 60607
(312) 226-0675
FAX (312) 226-1053
E-mail: rjsattorney@aol.com
schwartzlawfirm@comcast.net
Co-Liaison Counsel

Jordan L. Lurie
Zev B. Zysman Attorneys for Kathryn E. Stepkowski
WEISS & LURIE
10940 Wilshire Blvd.
23rd Floor
Los Angeles, CA 90024
(310) 208-2800
E-mail: jlurie@wllawca.com
lparker@weisslurie.com

zzysman@weisslurie.com

Co-Lead Counsel

Charles Dittmer, Jr. Attorney for Megan Noblett and Chris Noblett

3005 Harvard Avenue Suite 101

Metairie, LA 70006

(504) 887-2700

Email: cwdjrlawyer@netscape.net

Joseph R. Rydzewski Attorney for Angelina Salvo and Kenneth

HCR 6, Box 6025 Salvo

Hawley, PA 18428

(570)226-6229

Email: joerr@poconolawyers.com

Kenneth B. McClain Attorneys for Allison W. Merriott and R. Todd Merriott

Scott B. Hall

HUMPHREY, FARRINGTON &

MCCLAIN, P.C.

221 West Lexington, Suite 400

P.O. Box 900

Independence, MO 64051

(816) 836-5050

FAX: (816)836-8966

Email: kbm@hfmlegal.com

sbh@hfmlegal.com

/s/ Paul N. Rechenberg